

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

GEORGE SCHUSSEL,
Defendant

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) Cr. No. 04-10060-RCL
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ASSENTED-TO MOTION TO EXTEND SELF-SURRENDER DATE

Now comes the defendant, George Schussel, who hereby files this *assented-to* motion to change and extend the date presently set for his self-surrender to the facility designated by the United States Bureau of Prisons from August 31, 2007 to October 5, 2007 so as to permit the defendant to file a motion for bail pending appeal at the United States Court of Appeals for the First Circuit, to permit the Government to file its opposition to this motion, and to permit the Court the time necessary to resolve the motion prior to the start of the defendant's incarceration. In support of this motion, the defendant assigns the following grounds:

1. That he is currently scheduled to report to a facility designated by the United States Bureau of Prisons on August 31, 2007;
2. That a schedule requiring the August briefing of the substantiality of the issues relating to Schussel's appeal for the Court of Appeals would conflict with family vacation plans for counsel for both Schussel (early August) and the Government (late August);
3. That subject to the Court's discretion, the parties have agreed to the following schedule for briefing the bail pending appeal issues: the defendant would file his

motion and brief on or before September 5, 2007 and the Government would file its opposition on September 21, 2007;

4. That an agreed extension of the self-surrender date to October 5, 2007 would permit the Court of Appeals time to resolve the bail pending appeal motion prior to the start of Schussel's sentence.

This motion is assented-to by Assistant United States Attorneys Carmen Ortiz and Jack Pirozzolo.

Respectfully submitted,
BY HIS ATTORNEYS,

/s/ Martin G. Weinberg
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CERTIFICATE OF SERVICE

I, Martin G. Weinberg, hereby certify that on this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on August 7, 2007.

/s/ Martin G. Weinberg